

# UNITED STATES DISTRICT COURT

for the

Middle District of North Carolina

United States of America

v.

KARIME WILLIAMS

Case No.

1:22mj3510

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 13, 2022 in the county of Durham in the Middle District of North Carolina, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. Section 922(g)(1)

Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached affidavit of ATF Task Force Officer Thomas M. Thrall.

☒ Continued on the attached sheet.

On this day, the applicant appeared before me via reliable electronic means, that is by telephone, was placed under oath, and attested to the contents of this Criminal Complaint and attached affidavit in accordance with the requirements of Fed. R. Crim. P. 4.1.

Date:

12/13/2022

City and state:

Greensboro, North Carolina



Digitally signed by Thomas Thrall  
Date: 2022.12.13 17:39:41 -05'00'

*Complainant's signature*

Thomas M. Thrall, Task Force Officer, ATF

*Printed name and title*



*Judge's signature*

L. Patrick Auld, U.S. Magistrate Judge

*Printed name and title*

## AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Thomas M. Thrall, a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), being duly sworn, hereby depose and state as follows:

### Introduction

1. This affidavit is made in support of complaints against Karime WILLIAMS and Shay Neil JOHN, charging that on December 13, 2022, WILLIAMS and JOHN each committed the federal offense of felon in possession of a firearm, in violation of 18 U.S.C. §§ 922(g)(1).

### Affiant Background

I am a Task Force Officer (TFO) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and am currently assigned to the ATF Charlotte Field Division, Raleigh Field Office. I have been an ATF TFO since 2021. I am also a sworn law enforcement officer with the City of Durham Police Department and have been since June of 2002. Prior to being assigned as a Task Force Officer with the ATF, I was assigned to the Durham Police Department's Vice-Narcotics Unit, Drug Interdiction Unit, HEAT Team, Gang Resistance Unit, and Uniform Patrol Division.

When assigned to the Uniform Patrol Division, I was a certified Field Training Officer. I am certified by the State of North Carolina Training and Standards as a General Instructor with specialized certifications in Physical

Fitness, Driving and Rapid Deployment. I have taught classes on these subjects as well as on Controlled Substances and Traffic Stops. During my career, I have participated in the execution of numerous search warrants and have recovered illegally possessed firearms in various situations. As an ATF TFO, I have received training in federal firearm violations.

Karime WILLIAMS is a Felon

2. Karime WILLIAMS was convicted of Conspiracy to Distribute a Mixture Containing Cocaine and Heroin (21 U.S.C. § 846) in 2007 in the United States District Court for the District of Maryland (1:06cr323) and sentenced to 70 months in the United States Bureau of Prisons.

Shay Neil JOHN is a Felon

3. Shay Neil JOHN was convicted of Distribution and Possession with Intent to Distribute Cocaine (21 U.S.C. § 841(a)(1)) in 2013 in the United States District Court for the Middle District of Florida (8:11cr450) and sentenced to 70 months in the United States Bureau of Prisons.

WILLIAMS and JOHN Each Possessed a Handgun on December 13, 2022

4. On December 13, 2022, at approximately 7:45 am, Durham Police Department investigators executed a search warrant at a two-bedroom apartment on Winding Creek Circle in Durham, North Carolina in connection with a homicide and aggravated assault investigation.



5. Durham Police Department Selective Enforcement Team (SET) entered the apartment and saw WILLIAMS in his bed. On the floor next to WILLIAMS, within reach, was a Glock 10mm handgun with an extended magazine. The handgun appeared to also have a “switch” affixed to the rear of its slide. A “switch” enables a handgun to fire as a fully automatic firearm.



WILLIAMS put on socks, a shirt, and pants from the bedroom. Investigators recovered a letter dated December 12, 2022, in the apartment from the apartment management company addressed to WILLIAMS “and all other Occupants.” A woman was also in the apartment.

6. Investigators encountered JOHN in his bed in a second bedroom. On a bedside table, within reach of JOHN, was a Glock .40 caliber handgun with an extended magazine. The handgun appeared to have a “switch” affixed to the rear of its slide. Two additional magazines were next to the handgun. Paperwork in JOHN’s name was located next to the handgun.



### Interstate Nexus

7. Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Special Agent Lawrence Dickerson is a firearms nexus expert and has been qualified as such on previous occasions in federal court. Upon his review of both Glock handguns, he determined that they were manufactured outside the state of North Carolina.

### Conclusion:

8. Based on the facts set forth above, I submit that there is probable cause to believe that Karime WILLIAMS and Shay Neil JOHN, having been previously convicted of a felony punishable by a term of imprisonment exceeding one year, and with knowledge of that conviction, each knowingly possessed a firearm, in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



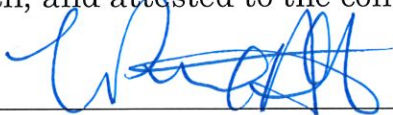
Digitally signed by Thomas Thrall

Date: 2022.12.13 17:50:44 -05'00'

Thomas M. Thrall, Task Force Officer  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
United States Department of Justice

Dated: December 14, 2022

Pursuant to Rule 4.1 of the Federal Rules of Criminal Procedure, the affiant appeared before me via reliable electronic means (telephone), was placed under oath, and attested to the contents of this written affidavit.



L. Patrick Auld  
United States Magistrate Judge  
Middle District of North Carolina